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IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS

CLERK, U.S. DISTRICT COURT

UNITED STATES OF AMERICA,

Plaintiff,

v.

JEWEL FOOD STORES, INC.

Defendant.

CIVIL ACTION NO.

05C 0809

JUDGE KENNELLY

MAGISTRATE JUDGE DENLOW

COMPLAINT

The United States of America, by the authority of the Attorney General of the United States and through the undersigned attorneys, acting at the request of the Administrator of the United States Environmental Protection Agency (EPA), files this Complaint and alleges as follows:

STATEMENT OF THE CASE

1. This is a civil action brought pursuant to the Clean Air Act, (the Act), 42 U.S.C. § 7401 et seq., against Defendant, Jewel Food Stores, Inc. (Jewel or Defendant), for civil penalties and injunctive relief for violations of the commercial refrigerant repair, testing, record-keeping, and reporting regulations at 40 C.F.R. Part 82, Subpart F, §§ 82.152 - 82.166, (Recycling and Emission Reduction), promulgated pursuant to Subchapter VI of the Act (Stratospheric Ozone Protection), 42 U.S.C. §§ 7671 - 7671q.

2. This action concerns Jewel's stores located in the Chicago, Illinois metropolitan area

and which are listed in Appendix A (collectively the Stores).

JURISDICTION AND VENUE

3. This Court has jurisdiction over the subject matter of this action pursuant to Section 113(b) of the Act, 42 U.S.C. § 7413(b) and 28 U.S.C. §§ 1331, 1345, 1355.

4. Venue is proper in the Northern District of Illinois, pursuant to Section 113(b) of the Act, 42 U.S.C. § 7413(b), and 28 U.S.C. §§ 1391(b) and 1395(a) because it is the judicial district in which Defendant's principal place of business is located.

NOTICE AND AUTHORITY

5. The United States Department of Justice has authority to bring this action on behalf of the Administrator of the EPA pursuant to 28 U.S.C. §§ 516, and 519, and Section 305(a) of the Act, 42 U.S.C. § 7605(a).

6. Pursuant to Section 113(b) of the Act, 42 U.S.C. § 7413(b), the United States has notified the State of Illinois (in which all of the Stores are located) that the United States is commencing this action against Jewel.

DEFENDANT

7. Jewel is a corporation incorporated under the laws of the State of New York. Jewel is a retail grocery chain that uses commercial refrigeration units for chilling its food display cases.

8. Jewel is a "person," as that term is defined at Section 302(e) of the Act, 42 U.S.C. § 7602(e) and 40 C.F.R. § 82.152, and within the meaning ascribed under Section 113 of the Act, 42 U.S.C. § 7413.

DEFINITIONS

9. As defined by 40 C.F.R. § 82.152, the phrase "commercial refrigeration" means, for

the purposes of 40 C.F.R. § 82.156(i)(1), the refrigeration appliances utilized in the retail food and cold storage warehouse sectors, including, refrigeration equipment found in supermarkets and convenience stores.

10. An "appliance" includes any device which contains and uses a class I or class II substance as a refrigerant used for commercial purposes, including any refrigerator, chiller or freezer. 40 C.F.R. § 82.152.

STATUTORY AND REGULATORY PROVISIONS

11. Subchapter VI of the Act, 42 U.S.C. §§ 7671-7671q, implements the Montreal Protocol on Substances that Deplete the Ozone Layer, and mandates the elimination or control of emissions of substances known to or suspected of destroying the stratospheric ozone layer, known as class I and class II ozone-depleting substances.

12. Section 608 of Subchapter VI, 42 U.S.C. § 7671g (National Recycling and Emission Reduction Program) requires EPA to promulgate regulations establishing standards and requirements regarding the use and disposal of regulated refrigerants, known as class I and class II ozone-depleting substances, during the servicing, repair, or disposal of appliances used for commercial refrigeration. Such regulations are to reduce the use and emission of known or suspected ozone-depleting substances to their "lowest achievable level" and "maximize the recapture and recycling of such substances." Section 608(a) of the Act, 42 U.S.C. § 7671g(a).

13. EPA promulgated the regulations required by Section 608 of the Act, codified at 40 C.F.R. Part 82, Subpart F, §§ 82.150- 82.166, (Subpart F Regulations), on May 14, 1993 (58 Fed. Reg. 28,712).

14. The Subpart F Regulations include leak repair requirements with regard to, inter alia,

“commercial refrigeration” equipment containing greater than fifty (50) pounds of refrigerant. 40 C.F.R. § 82.156(i).

15. Subchapter VI of the Act prohibits any person “maintaining, servicing, repairing, or disposing of an appliance . . . , to knowingly vent or otherwise release or dispose of any such class I or class II substances used as a refrigerant in such appliance in a manner which permits such substance to enter the environment.” 42 U.S.C. § 7671g(c)(1). The Subpart F Regulations reiterate this prohibition. 40 C.F.R. § 82.154(a).

16. The Subpart F Regulations at 40 C.F.R. § 82.156 prohibit leaks of ozone-depleting substances from commercial refrigeration equipment having a charge of 50 or more pounds, and require that leaks at excessive rates be timely repaired, or the equipment be retrofitted or replaced.

17. The maximum allowable leak rate of ozone-depleting substances from commercial refrigeration equipment having a charge of 50 or more pounds, on an annualized basis, is 35%. 40 C.F.R. § 82.156.

18. If commercial refrigeration equipment is leaking ozone-depleting substances at an annualized rate greater than 35%, the owner/operator of such equipment must repair the leak, bringing the annualized leak rate below 35%, within thirty days after the owner/operator discovered, or should have known of, the leak. 40 C.F.R. §§ 82.156(i)(1) and (i)(9).

19. The Subpart F Regulations provide an exception to the requirement that the leaking equipment be repaired within 30 days. Leaks do not need to be repaired if, within 30 days after discovering the leak, the owner/operator develops a written, detailed plan to retire the equipment and replace it with equipment that uses non-ozone depleting substances or a less ozone-depleting

substance or to retrofit the existing equipment within one year. 40 C.F.R. § 82.156(i)(6). The plan must be dated, and all work under the plan must be completed within one year except as otherwise provided by the Subpart F Regulations.

20. The Subpart F regulations establish record-keeping requirements. The owner/operator of appliances containing 50 or more pounds of refrigerant must maintain, inter alia, records documenting the date and type of service, as well as the amount of refrigerant added to the equipment. 40 C.F.R. § 82.166(k).

21. Pursuant to 40 C.F.R. § 82.166(n), the owner/operator of commercial refrigeration equipment must maintain information on-site and must report to the EPA, inter alia, the leak rate of any equipment, the method used to determine the leak rate, the date a leak rate greater than the allowable leak rate was discovered, the location and extent of leaks, and the date and type of repair work that has been completed.

22. Section 113(b) of the Act, 42 U.S.C. § 7413(b), authorizes the United States to commence a civil action for a permanent or temporary injunction, and to assess civil penalties up to \$27,500 per day for each violation of Section 608 of the Act, 42 U.S.C. § 7671g, prior to March 15, 2004, and for civil penalties up to \$32,500 per day for each violation occurring on and after that date pursuant to Pub. L. 104-134.

GENERAL ALLEGATIONS COMMON TO ALL FACILITIES

23. At all times relevant to this Complaint, Jewel has been the “owner or operator” of one or more commercial refrigeration systems at each of the Stores normally containing more than 50 or more pounds of R-502, R-22, R-401A, or R-402A, which are regulated “class I” or “class II” substances within the meaning of Section 602(b) of the Act, 42 U.S.C. § 7671a(b), 40 C.F.R.

Part 82, Subpart A, Appendix B, 40 C.F.R. § 82.154(a), and 40 C.F.R. Part 82, Subpart F, Appendix B.

24. The commercial refrigeration systems at each of the Stores constitute “commercial refrigeration equipment” as described in 40 C.F.R. §§ 82.152 and 82.156, and are “appliances” within the meaning of 42 U.S.C. § 7671(1) and 40 C.F.R. § 82.152(a).

FIRST CLAIM FOR RELIEF
(VIOLATIONS OF SECTION 608 OF THE ACT AND 40 C.F.R. § 82.156(i)(1))

25. Paragraphs 1 through 24 are realleged and incorporated herein by reference.

26. Upon information and belief, the annualized leak rates of class I and class II substances from one or more commercial refrigeration systems at some or all of the Stores exceeded 35 percent on one or more occasions, and Jewel failed within 30 days to repair the leak, without otherwise developing a one-year plan for retrofit or retirement of one or more of such leaking appliances, in violation of Section 608 of the Act, 42 U.S.C. § 7671g, and 40 C.F.R. § 82.156(i)(1).

27. For each violation of Section 608 of the Act, 42 U.S.C. § 7671g, and 40 C.F.R. § 82.156(i)(1), at each such leaking commercial refrigeration system at the Stores, Jewel is liable for civil penalties of not more \$27,500 per day for each violation occurring on or before March 15, 2004, and \$32,500 per day for each violation occurring after March 15, 2004.

28. Pursuant to Section 113(b) of the Act, 42 U.S.C. § 7413, permanent injunctive relief should be entered requiring, among other things, that Jewel retrofit or retire each such leaking commercial refrigeration system at the Stores.

SECOND CLAIM FOR RELIEF

(VIOLATIONS OF SECTION 608 OF THE ACT AND 40 C.F.R. § 82.156(i)(6))

29. Paragraphs 1 through 24 and 26 are realleged and incorporated herein by reference.

30. Upon information and belief, Jewel failed to develop a written, one-year retrofit or retirement plan for leaking commercial process refrigeration systems as required by Section 608 of the Act, 42 U.S.C. § 7671g, and 40 C.F.R. § 82.156(i)(6) with respect to one or more leaking commercial process refrigeration systems at some or all of the Stores.

31. For each violation of Section 608 of the Act, 42 U.S.C. § 7671g, and 40 C.F.R. § 82.156(i)(6), at each commercial refrigeration system at the Stores, Jewel is liable for civil penalties of not more \$27,500 per day for each violation occurring on or before March 15, 2004, and \$32,500 per day for each violation occurring after March 15, 2004.

32. Pursuant to Section 113(b) of the Act, 42 U.S.C. § 7413, permanent injunctive relief should be entered requiring, among other things, that Jewel retrofit or retire each such leaking commercial refrigeration system at the Stores.

THIRD CLAIM FOR RELIEF

(VIOLATIONS OF SECTION 608 OF THE ACT AND 40 C.F.R. § 82.156(i)(6))

33. Paragraphs 1 through 24, 26 and 30 are realleged and incorporated herein by reference.

34. Upon information and belief, Jewel failed to complete the retrofit or replacement of leaking commercial refrigeration equipment, or otherwise comply with Section 608 of the Act, 42 U.S.C. § 7671g, and 40 C.F.R. § 82.156(i)(6), within one year of determining that repairs to the commercial refrigeration equipment were not successfully completed with respect to one or

more commercial refrigeration systems at each of the Stores.

35. For each violation of Section 608 of the Act, 42 U.S.C. § 7671g, and 40 C.F.R. § 82.156(i)(6), at each such leaking commercial refrigeration system at the Stores, Jewel is liable for civil penalties of not more \$27,500 per day for each violation occurring on or before March 15, 2004, and \$32,500 per day for each violation occurring after March 15, 2004.

36. Pursuant to Section 113(b) of the Act, 42 U.S.C. § 7413, permanent injunctive relief should be entered requiring, among other things, that Jewel retrofit or retire each such leaking commercial refrigeration system at the Stores.

FOURTH CLAIM FOR RELIEF
(VIOLATIONS OF SECTION 608 OF THE ACT AND 40 C.F.R. § 82.166)

37. Paragraphs 1 through 24, 26, 30 and 34 are realleged and incorporated herein by reference.

38. Upon information and belief, Jewel failed at relevant times to maintain and, as applicable, provide to EPA, information, records or reports: (a) detailing the date and type of service as well as the amount of refrigerant added to commercial refrigeration equipment as required by 40 C.F.R. § 82.166(k); and (b) specifying the leak rate of equipment, the method used to determine the leak rate, the date that a greater than allowable leak rate was discovered, the location and extent of leaks, and the date and type of repair work that was completed as required by 40 C.F.R. § 82.166(n);

39. Jewel failed to comply with the record-keeping and reporting requirements described in the preceding paragraph at some or all of the Stores.

40. For each violation of Section 608 of the Act, 42 U.S.C. § 7671g, and 40 C.F.R.

§ 82.166, at the Stores, Jewel is liable for civil penalties of not more \$27,500 per day for each violation occurring on or before March 15, 2004, and \$32,500 per day for each violation occurring after March 15, 2004.

41. Pursuant to Section 113(b) of the Act, 42 U.S.C. § 7413, permanent injunctive relief should be entered requiring, among other things, that Jewel comply with the record-keeping and reporting requirements for one or more commercial refrigeration systems at each of the Stores.

PRAYER FOR RELIEF

WHEREFORE, Plaintiff, the United States of America, prays that the Court:

A. Assess civil penalties against Jewel of not more than \$27,500 per day for each violation or failure to comply with the Subpart F Regulations or the Clean Air Act occurring on or before March 15, 2004, and \$32,500 per day for each violation or failure to comply occurring after March 15, 2004;

B. Enter an affirmative injunction requiring Jewel to comply with Section 608 of the Act and the Subpart F regulations at each of the Stores, including, when required by the Subpart F regulations, to retrofit or retire one or more commercial process refrigeration units;

- C. The United States be awarded its costs and expenses incurred in this action; and
- D. Grant the United States such other and further relief as this Court deems appropriate.

Respectfully submitted,

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Appendix A
Jewel Food Stores Located in the Chicago Metropolitan Area

	<u>ABS No.</u>	<u>Street No.</u>	<u>Street Address</u>	<u>City / Illinois / Zip Code</u>
1.	3068	4	E. Ogden Avenue	Westmont 60559
2.	3469	16	S. Waukegan Road	Deerfield 60015
3.	3220	20	W. Biesterfield Rd.	Elk Grove Village 60007
4.	3191	20	S. Weber Rd.	Romeoville 60446
5.	3230	30	Danada Square, W.	Wheaton 60187
6.	3284'	33	St. Charles Rd.	Villa Park, IL 60181
7.	3445	45	Plum Grove Road	Palatine 60067
8.	3479	79	McHenry Road	Buffalo Grove 60089
9.	3181'	87	W. 87th Street	Chicago 60620
10.	3256	103	S. Randall Road	Algonquin 60102
11.	3214	114	Willow Street	Wheaton 60187
12.	3219	119	Randall Road	Batavia 60510
13.	3422	122	N. Vail Street	Arlington Hts. 60005
14.	3276	125	E. Stearns Road	Bartlett 60103
15.	3110	126	E. Boughton Road	Bolingbrook 60440
16.	3294	140	W. Lake Street	Addison 60101
17.	3346	153	Schiller Street	Elmhurst 60126
18.	3338	177	W. Roosevelt Road	West Chicago 60185
19.	3084	199	Brookforest	Shorewood 60431
20.	3102	234	E. Veterans Parkway	Yorkville 60560
21.	3003	303	Holmes Avenue	Clarendon Hills 60514
22.	3072'	306	E. 144th Street	Dolton 60419
23.	3250	350	Lake Marion Road	Carpentersville 60110
24.	3052	352	LaGrange Road	Frankfort 60423
25.	3444"	410	Eastwood Dr.	Woodstock, IL 60098
26.	3288	438	W. Madison Street	Oak Park 60302
27.	3478	440	E. Rand Rd.	Arlington Hts. 60004
28.	3043	443	E. 34th Street	Chicago 60616
29.	3156	446	S. Washington	Kankakee 60901
30.	3483	452	Lakehurst Road	Waukegan 60085
31.	3161	455	Main Street	Bourbonnais 60914
32.	3481	481	Busse Highway	Park Ridge 60068
33.	3485	485	Ela Road	Lake Zurich 60047
34.	3515	547	Liberty Street	Wauconda 60084
35.	3368	550	N. State St.	Chicago 60610
36.	3340	599	E. Roosevelt Road	Glen Ellyn 60137
37.	3496	696	Northwest Hwy.	Cary 60013

38.	3246	750	Army Trail Rd.	Carol Stream 60188
39.	3063	763	E. 162nd Street	South Holland 60473
40.	3290'	800	W. North Ave.	Melrose Park, IL 60160
41.	3473	819	S. Elmhurst Road	Des Plaines 60016
42.	3432	900	E. Rollins Road	Round Lake Beach 60073
43.	3516	922	N. Green Bay Rd.	Waukegan 60085
44.	3244	944	S. York Road	Elmhurst 60126
45.	3466	966	Rt. 59	Antioch 60002
46.	3291	1040	Summit Avenue	Elgin 60120
47.	3316	1069	Roselle Road	Hoffman Estates 60172
48.	3428	1128	Chicago Avenue	Evanston 60202
49.	3048	1148	Ogden Avenue	Downers Grove 60515
50.	3308	1151	S. Roselle Road	Schaumburg 60193
51.	3056	1156	Maple Avenue	Lisle 60532
52.	3240	1157	Eola Road	Aurora 60504
53.	3278	1177	S. Main Street	Lombard 60148
54.	3210	1210	N. Clark Street	Chicago 60610
55.	3344	1220	S. Ashland Avenue	Chicago 60608
56.	3345	1224	S. Wabash	Chicago 60605
57.	3111	1227	Naper Blvd.	Naperville 60540
58.	3306	1250	W. Main Street	West Dundee 60118
59.	3270	1270	N. Lake Str.	Aurora 60506
60.	3406	1300	S. Milwaukee Avenue	Libertyville 60048
61.	3241	1341	N. Paulina Street	Chicago 60622
62.	3421'	1400	21st St.	Zion, IL 60099
63.	3486	1485	Palatine Road	Hoffman Estates 60195
64.	3425	1500	Lee Street	Des Plaines 60016
65.	3488	1501	S. Lake Street	Mundelein 60060
66.	3471	1517	Sheridan Road	Wilmette 60091
67.	3313	1660	Larkin Avenue	Elgin 60120
68.	3266	1710	N. Kostner Avenue	Chicago 60639
69.	3252	1952	Galena Blvd.	Aurora 60506
70.	3283	2031	N. Main Street	Wheaton 60187
71.	3331'	2073	Prairie St.	St. Charles, IL 60174
72.	3228	2128	S. Mannheim Road	Westchester 60154
73.	3264	2164	Bloomington Road	Glendale Hts. 60139
74.	3062	2317	75th Street	Woodridge 60517
75.	3183	2320	Burr Oak	Blue Island 60406
76.	3090	2500	Lincoln Highway	Olympia Fields 60461
77.	3216'	2501	Schaumburg Road	Schaumburg 60172
78.	3138	2540	U.S. Route 30	Oswego 60543
79.	3491	3000	Kirchoff Road	Rolling Meadows 60008

80.	3232	3033	S. Halsted Street	Chicago 60608
81.	3222†	3120	N. Pulaski	Chicago, IL 60641
82.	3114	3128	W. 103rd Street	Chicago 60655
83.	3159	3153	W. 183rd Street	Homewood 60430
84.	3167	3220	S. Chicago Road	So. Chicago Hts. 60411
85.	3501	3400	N. Western Avenue	Chicago
86.	3470'	3570	N. Elston Avenue	Chicago 60618
87.	3430	3630	N. Southport	Chicago 60613
88.	3302	3644	S. Archer Avenue	Chicago 60608
89.	3139	3940	E. 106th Street	Chicago 60617
90.	3442	4042	W. Foster Avenue	Chicago 60630
91.	3468'	4222	Elm St.	McHenry, IL 60050
92.	3454	4250	N. Lincoln Avenue	Chicago 60618
93.	3455	4355	N. Sheridan Road	Chicago 60613
94.	3157	4650	W. 103rd Street	Oak Lawn 60453
95.	3282	4729	N. Central Avenue	Chicago 60630
96.	3280††	5129	Belmont	Chicago, IL 60641
97.	3170	5320	S. Pulaski	Chicago 60632
98.	3443	5343	N. Broadway	Chicago 60640
99.	3407	5516	N. Clark Street	Chicago 60640
100.	3163	5616	W. 159th Street	Oak Forest 60452
101.	3484'	5667	W. Touhy Ave.	Niles 60714
102.	3057	6057	S. Western Avenue	Chicago 60636
103.	3721	6107	S. Archer Ave.	Chicago 60638
104.	3047	6215	S. Main Street	Downers Grove 60515
105.	3224	6430	W. Irving Park Rd.	Chicago 60634
106.	3258†	6505	W. Diversey	Chicago, IL 60636
107.	3236	7036	Roosevelt Road	Oak Park 60304
108.	3049	7127	W. 127th Street	Palos Heights 60463
109.	3254	7201	W. 24th Street	North Riverside 60546
110.	3123	7335	S. Cass Avenue	Darien 60561
111.	3223	7525	W. Lake Street	River Forest 60305
112.	3030	7530	S. Stony Island	Chicago 60649
113.	3427	8203	Golf Road	Niles 60714
114.	3429	8730	W. Dempster Street	Niles 60714
115.	3086	8801	S. Ridgeland Avenue	Oak Lawn 60453
116.	3176	9400	S. Ashland Avenue	Chicago 60620
117.	3029	9528	S. Roberts Rd.	Hickory Hills 60457
118.	3160	9652	W. 131st Street	Palos Park 60464
119.	3257	10203	W. Grand Avenue	Franklin Park 60131
120.	3089	11414	S. Halsted Street	Chicago 60628
121.	3098	12001	S. Crawford Avenue	Alsip 60803

122.	3394	13200	Village Green Drive	Huntley 60142
123.	3190	13460	S. Rte. 59	Plainfield 60544
124.	3720	16625	W. 159th	Lockport 60441
125.	3165	17117	S. Harlem Avenue	Tinley Park 60477
126.	3192	17930	S. Wolf Rd.	Orland Park 60467
127.	3185	127	E. Ogden	Naperville 60563
128.	3451	150	West Main Street	Barrington 60010
129.	3268	217	Irving Park Road	Streamwood 60103
130.	3476	333	E. Euclid Avenue	Mt. Prospect 60056
131.	3341	343	W. Irving Park Road	Wood Dale 60190
132.	3343	375	Randall Road	South Elgin 60177
133.	3456	411	N. Greenbay Road	Wilmette 60091
134.	3474	423	E. Dundee	Palatine 60067
135.	3178	475	N. Nelson Road	New Lenox 60451
136.	3265	507	E. Woodlawn	LaGrange Park 60526
137.	3260	652	Kirk Road	St. Charles 60174
138.	3464	885	E. Belvidere Road	Grayslake 60030
139.	3490	890	N. Western Avenue	Lake Forest 60045
140.	3013	1200	W. Boughton Road	Bolingbrook 60440
141.	3182	1202	State Street	Lemont 60439
142.	3453	1350	S. Route 12	Fox Lake 60020
143.	3074	1401	W. Jefferson	Joliet 60431
144.	3124	1537	N. Larkin Street	Joliet 60431
145.	3459	1600	Deerfield Road	Highland Park 60035
146.	3092	1655	E. 95th Street	Chicago 60617-4707
147.	3059	1759	W. Ogden	Naperville 60540
148.	3461	1860	S. Arlington Heights Ro	Arlington Heights 60005
149.	3080	2480	Rte 59	Plainfield 60544
150.	3487	2485	Howard Street	Evanston 60202
151.	3426	2502	Waukegan Road	Glenview
152.	3519	2775	Pfingsten Road	Glenview 60025
153.	3058	2855	W. 95th Street	Naperville 60564
154.	3441	2940	N. Ashland Avenue	Chicago 60657
155.	3424	3124	N. Lewis Avenue	Waukegan 60087
156.	3514	3531	N. Broadway	Chicago 60657
157.	3518	4222	Elm Street	McHenry 60050
158.	3262	4660	W. Irving Park Road	Chicago 60641
159.	3477	4734	N. Pueblo	Chicago 60656
160.	3154	5545	Brainard Avenue	Countryside 60525
161.	3517	6140	Northwest Hwy.	Crystal Lake 60014
162.	3405	6509	Grand Avenue	Gurnee 60031
163.	3103	7122	W. 40th Street	Stickney 60402

164.	3296	7342	W. Foster Avenue	Chicago 60656
165.	3446	7900	N. Milwaukee Avenue	Niles 60714
166.	3060	7910	S. Cicero Avenue	Burbank 60459
167.	3051	9350	W. 159th Street	Orland Park 60462
168.	3107	9424	S. Pulaski Road	Oak Lawn 60453
169.	3465	9449	Skokie Blvd.	Skokie 60076
170.	3188	17705	S. Halsted Street	Homewood 60430
